IN THE CIRCUIT COURT OF THE
ELEVENTH JUDICIAL CIRCUIT OF
FLORIDA, IN AND FOR DADE COUNTY

IN CHANCERY NO. 179,408

STUYVESANT CORPORATION,
a Florida corporation,

Plaintiff

- versus -

HOTEL EMPLOYEES' UNION, LOCAL
NO. 255 (A. F. of L.) et al.,

Defendants

STIPULATION

It is stipulated by and between solicitors for the respective parties that the above captioned cause is at issue, all pending motions are hereby withdrawn, including petition for intervention; that the issues of this cause are contained within the complaint and answer, excepting, however, that prayer for affirmative relief in the answer is withdrawn; that the testimony heretofore taken on behalf of plaintiff and defendants be deemed and considered as testimony at final hearing; that this stipulation be submitted to the Chancellor for entry of final decree based upon the evidence heretofore in[illegible] in the light of the issues made by the complaint and the answer.

WITNESS our hands at Miami, Florida, this 13 day of June, 1956.

SIBLEY & DAVIS
Solicitors for Plaintiff

By _____

GRAMLING & GRAMLING
J. W. BROWN
BEN GETLER
Solicitors for Defendants

By _____

IN THE CIRCUIT COURT OF THE
ELEVENTH JUDICIAL CIRCUIT OF
FLORIDA, IN AND FOR DADE COUNTY

IN CHANCERY NO. 179,408

STUYVESANT CORPORATION,
a Florida corporation,

Plaintiff

- versus -

HOTEL EMPLOYEES' UNION, LOCAL
NO. 255 (A. F. of L.) et al.,

Defendants

FINAL DECREE

COPY

This cause coming on to be heard for final hearing in accordance with stipulation, and the Court being fully advised in the premises, it is, therefore,

ORDERED, ADJUDGED AND DECREED that the temporary restraining order heretofore entered be and the same is hereby made permanent.

DONE AND ORDERED in Chambers at Miami, Florida, this _____ day of June, 1955.

Circuit Judge

IN THE CIRCUIT COURT OF THE
ELEVENTH JUDICIAL CIRCUIT,
IN AND FOR DADE COUNTY,
FLORIDA. IN CHANCERY.

NO. 179,408

STUYVESANT CORPORATION, :
a Florida corporation,
:
Plaintiff,
:
vs. STIPULATION
:
HOTEL EMPLOYEES UNION,
LOCAL NO. 255 (A. F. of L.) :
et als.,
:
Defendants.
:
. . . . . .

IT IS HEREBY STIPULATED AND AGREED by and between solicitors for the respective parties that the above-captioned cause is at issue, all pending motions are hereby withdrawn, including petition for intervention; that the issues of this cause are contained within the complaint and answer, excepting, however, that prayer for affirmative relief in the answer is withdrawn; that the testimony and proofs heretofore taken before the Court on behalf of the plaintiff and defendants upon the application for temporary injunction and motion to dissolve, be deemed and considered as testimony and proofs at final hearing; that this stipulation be submitted to the Chancellor for entry of final decree based upon the evidence and proofs heretofore introduced as aforesaid in the light of the issues made by the complaint and the answer.

DATED at Miami, Florida, this ____ day of June, 1955.

GRAMLING & GRAMLING
J. W. BROWN
BEN GETLER
Attorneys for Defendants

By:_____
of counsel.

SIBLEY & DAVIS
Attorneys for Plaintiff

By:_____
MARION E. SIBLEY,
of counsel.

LAW OFFICES
SIBLEY & DAVIS
MIAMI BEACH

IN THE CIRCUIT COURT OF THE
ELEVENTH JUDICIAL CIRCUIT OF
FLORIDA, IN AND FOR DADE COUNTY

IN CHANCERY NO. 180,056-C

ABE ALLENBERG, A. BIRNBAUM
d/b/a MIAMI COLONIAL HOTEL, MORRIS
ROSENBERG, MORRIS FISHER,

Plaintiffs

- versus -

HOTEL EMPLOYEES' UNION LOCAL #255,
(A. F. of L) et al.,

Defendants

STIPULATION

It is stipulated by and between solicitors for the respective parties that the above captioned cause is at issue, all pending motions are hereby withdrawn, including Petition of Intervention; that the issues of this cause are contained within the complaint and answer, excepting, however, that prayer for affirmative relief in the answer is withdrawn; that the testimony heretofore taken on behalf of plaintiffs and defendants be deemed and considered as testimony at final hearing; that this stipulation be submitted to the Chancellor for entry of final decree based upon the evidence heretofore interposed in the light of the issues made by the complaint and the answer.

WITNESS our hands at Miami, Florida, this 13 day of June, 1955.

SIBLEY & DAVIS
SOLICITORS FOR PLAINTIFFS

By_____

GRAMLING & GRAMLING
J.W. BROWN
BEN GETLER
SOLICITORS FOR DEFENDANTS

By_____

GRAMLING & GRAMLING, SUITE 224 SHORELAND BUILDING, MIAMI 32, FLORIDA

IN THE CIRCUIT COURT OF THE
ELEVENTH JUDICIAL CIRCUIT OF
FLORIDA, IN AND FOR DADE COUNTY

IN CHANCERY NO. 180,056 C

ABE ALLENBERG, A. HIRNBAUM,
d/b/a MIAMI COLONIAL HOTEL,
MORRIS ROSENBERG, MORRIS
FISHER,

Plaintiffs

- versus -

HOTEL EMPLOYEES' UNION, LOCAL
NO. 255 (A. F. of L.) et al.,

Defendants

FINAL DECREE

COPY

This cause coming on to be heard for final hearing in accordance with stipulation, and the Court being fully advised in the premises, it is, therefore,

ORDERED, ADJUDGED AND DECREED that the temporary restraining order heretofore entered be and the same is hereby made permanent.

DONE AND ORDERED in Chambers at Miami, Florida, this _____ day of June, 1955.

_____
Circuit Judge

LAW OFFICES
GRAMLING & GRAMLING
SUITE 224 SHORELAND BUILDING
MIAMI 32, FLORIDA

IN THE CIRCUIT COURT OF THE
ELEVENTH JUDICIAL CIRCUIT,
IN AND FOR DADE COUNTY,
FLORIDA. IN CHANCERY.

NO. 180,056-C

ABE ALLENBERG, et als. d/b/a MIAMI COLONIAL HOTEL,

Plaintiffs,

vs.

HOTEL EMPLOYEES UNION, LOCAL NO. 255 (A. F. of L.), et als.,

Defendants.

. . . . . .

STIPULATION

IT IS HEREBY STIPULATED AND AGREED by and between solicitors for the respective parties that the above-captioned cause is at issue, all pending motions are hereby withdrawn, including petition for in ervention; that the issues of this cause are contained within the complaint and answer, excepting, however, that prayer for affirmative relief in the answer is withdrawn; that the testimony and proofs heretofore taken before the Court on behalf of the plaintiff and defendants upon the application for temporary injunction and motion to dissolve, be deemed and considered as testimony and proofs at final hearing; that this stipulation be submitted to the Chancellor for entry of final decree based upon the evidence and proofs heretofore introduced as aforesaid in the light of the issues made by the complaint and the answer.

DATED at Miami, Florida, this ___ day of June, 1955.

GRAMLING & GRAMLING
J. W. BROWN
BEN GETLER
Attorneys for Defendants

By:_____
of counsel.

SIBLEY & DAVIS
Attorneys for Plaintiffs

By:_____
MARION E. SIBLEY,
of counsel.

LAW OFFICES
SIBLEY & DAVIS
MIAMI BEACH

LAW OFFICES
GRAMLING & GRAMLING
SUITE 224 SHORELAND BUILDING
MIAMI 32, FLORIDA

JOHN C. GRAMLING
J. CARRINGTON GRAMLING, JR

JUL 11 1955

July 8, 1955

vii

Mr. Marion Sibley
Attorney at Law
605 Lincoln Road
Miami Beach, Florida

Dear Marion:

I have forwarded a copy of the proposed stipulation in the Saxony case to J. W. Brown for his approval and I trust it meets with yours. If so, I will proceed to get up the affidavits of David Herman, attach the designation cards, and ballots in the Saxony, Casablanca, and Sea Isle cases.

If you have further suggestions concerning the Stipulation, please let me know so that Mr. Brown's office, this office and yours can come to a meeting of the minds to expedite the final termination of these three cases in this jurisdiction.

Cordially,

Carrington Gramling

CG:as

JUL 11 1955

IN THE CIRCUIT COURT OF THE 11TH
JUDICIAL CIRCUIT OF FLORIDA,
IN AND FOR DADE COUNTY

IN CHANCERY NO. 178554-D

SAX ENTERPRISE, INC.,

Plaintiff,

-vs-

HOTEL EMPLOYEES UNION, LOCAL NO. 255 (A. F. of L.), et al,

Defendants.

STIPULATION

COPY

IT IS HEREBY STIPULATED AND AGREED by and between solicitors for the respective parties that the above-captioned cause is at issue, all pending motions are hereby withdrawn, including petition for intervention; that the issues of this cause are contained within the complaint and answer (and Supplemental Answer), excepting, however, that prayer for affirmative relief in the answer is withdrawn; that the testimony and proofs heretofore taken before the Court on behalf of the plaintiff upon application for temporary injunction be deemed and considered as testimony of the plaintiff at final hearing; that the attached affidavits and exhibits be taken and accepted by the Chancellor as the testimony and exhibits of the defendants as fully and completely as though said cause was set for final hearing, and the affiants were duly sworn in open court and testifying according to attached affidavits; that this Stipulation and the attached affidavits be submitted to the Chancellor before whom the proofs were taken for entry of final decree based upon the evidence and proofs heretofore and herewith introduced, as aforesaid, in the light of the issues made by the complaint and the answer.

DATED at Miami, Florida, this _____ day of July A. D. 1955.

SIBLEY & DAVIS
Attorneys for Plaintiff

By: _____
Of Counsel

GRAHLING & GRAHLING
J. W. BROWN
BEN GETLER
Attorneys for Defendants

By: _____
Of Counsel

VIII A

OCT 27 1955

LAW OFFICES
GRAMLING & GRAMLING
SUITE 224 SHORELAND BUILDING
MIAMI 32, FLORIDA

JOHN C. GRAMLING
J. CARRINGTON GRAMLING, JR

October 26, 1955

IX

Marion Sibley, Esq.,
Attorney At Law
c/o Sibley & Davis
605 Lincoln Road
Miami Beach, Florida

Dear Marion:

I am sending a copy of the enclosed rough draft of the proposed Stipulation and Affidavit to J.W. Brown, Esq., and to you for the sole purpose of attempting to finalize those cases now pending in the Circuit Court. where the records therein are otherwise complete.

If this meets with your approval and with the approval of Mr. Brown, we should be able to move ahead with reasonable speed.

Cordially yours,

Carrington Gramling

CG:jg
enc.
copy: J.W. Brown

STIPULATION RE FINAL HEARING

IT IS STIPULATED by and between counsel for the respective parties that all testimony and other evidence heretofore introduced in this cause be and the same is hereby reaffirmed for the purpose of Final Hearing, with the single addition however, that at said Final Hearing, the defendants would produce CLARENCE SMITH as a witness, who would testify according to affidavit attached hereto, and it is

STIPULATED that said testimony would be objected to on the grounds that said testimony is immaterial and irrelevant; and it is

STIPULATED that this testimony and the objections thereto be submitted to the Chancellor for ruling thereon, and in the event the objection is sustained, the affidavit shall remain as part of the record as a proffer, and all objections as to form of such proffer be and they are hereby waived.

IT IS FURTHER stipulated that Final Decree be entered by the Chancellor upon the record as now made in the light of this Stipulation.

WITNESS our hands at Miami, Dade County, Florida, this _____day of November, 1955.

SIBLEY AND DAVIS
Attorneys for plaintiff

By:_____

J.W. BROWN and GRAMLING & GRAMLING

By:_____

A F F I D A V I T

Personally appeared before me the undersigned authority CLARENCE SMITH, who being by me first duly sworn deposes and says as follows:

"My name is CLARENCE SMITH, and I am Secretary- Treasurer of HOTEL EMPLOYEES UNION, Local 255. That plaintiffs, in the operation of their hotel are engaged in a business which affects interstate commerce in that thousands of persons are attracted to the State of Florida and come to the State of Florida for the purpose of staying at said hotel; that said thousands of persons come to Florida from various states of the United States outside of Florida, and from various countries outside of the United States by various inter-state and international carriers including airlines such as American Airlines, Pan American Airways, Delta Airlines, National Airlines, Eastern Airlines and various other airlines as well as inter-state railroads, inter-state bus lines, inter-state and international steamship companies, and by passenger automobiles. Said business further is part of "package deal" Arrangements with said various inter-state and International airlines, including Pan American Airways, American Airlines, Delta Airlines, Eastern Airlines, Transworld Airlines, National Airlines, and many others; various inter-state and international steamship companies including Peninsular and Occidental Steamship Companies, Waterman Steamship Corporation, and many other companies; various inter-state railroad companies including Seaboard Railroad Company, Southern Railway System, Florida East Coast Railway, Atlantic Coastline Railroad Company, Pennsylvania Railroad Company, Illinois Central Railroad Company and numerous other companies; and various inter-state bus lines companies including Greyhound Bus Lines Company, Trailway Bus System and various other inter-state bus lins companies. Said "package deals" arrangements whereby persons in states other than the State of Florida

and in countries other than the United States are sold tourist "packages" in said other states and countries, which "packages" include transportation to Miami Beach, Florida, and rooms, food and various services supplied by and at said hotel as an integral part of said inter-state and international sales. The advertsing and selling of the said "package" tours are done jointly by Plaintiffs and said inter- state carriers. All expense incurred in promoting, making and consummating said inter-state and international sales are jointly shared by Plaintiffs, and said inter- state and international carriers. The proceeds of said inter-state and international sales are divided between Plaintiff, as operator of said hotel and said inter-state and international carriers.

Said plaintiffs, as a part of the operation of said hotel, purchases numerous items from outside of the State of Florida and numerous other items within the State of Florida, which have been shipped into the State of Florida. Said Plaintiffs, as a part of the operation of said hotel, sell directly outside of the State of Florida and within the State of Florida for carriage or re-sale, outside of the State of Florida. Said plaintiffs as part of the operation of said hotel, advertise the said hotel by newspapers, trade journals, magazines, radio, television, direct mailings, distribution of pamphlets and literature and various other means in numerous of the states of the United States outside the State of Florida and in various countries outside of the United States.

FURTHER AFFIANT SAYETH NOT.

_____

Affiant

SWORN to and subscribed before

me this day of , 1955.

_____

Notary Public, State of Florida at Large

My Commission Expires: ____

BOOK 1226 PAGE 299

FILED FOR RECORD

FEB 27 11 02 AM 1956

CLK. C.C.

IN THE CIRCUIT COURT OF THE 11TH JUDICIAL CIRCUIT, IN AND FOR DADE COUNTY, FLORIDA. IN CHANCERY

NO. 180,677-E

filed this 21 day of Feb A. D. 1956

recorded this 28 day of Feb A. D. 1956

In Chancery Order Book 1226 on Page 299

E. B. LEATHERMAN,
Clerk Circuit Court

By [signature]

THOMAS JEFFERSON, INC., a Florida corporation,

Plaintiff,

-vs-

HOTEL EMPLOYEES UNION, LOCAL NO. 255, (A. F. of L.) et al.,

Defendants.)

FINAL DECREE

THIS CAUSE coming on to be heard on final hearing pursuant to the stipulation of the parties to this cause and the Court being fully advised in the premise, it is

ORDERED, ADJUDGED AND DECREED that the Motion To Dismiss for lack of jurisdiction urged by the Defendant in its Supplemental Answer alleging that Plaintiff is engaged in interstate commerce be and the same is hereby stricken together with that portion of the affidavit of Dave Herman in support thereof.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that the Temporary Restraining Order heretofore entered be and the same is hereby made permanent.

DONE AND ORDERED in Chambers, at Miami, Florida this 27 day of February, A.D., 1956.

[signature]
CIRCUIT JUDGE

21-184

Filed this 9 day of Jan A.D. 19 56
recorded this 10 day of Jan A.D. 19 56
in Chancery Order Book 217 on Page 313
E. B. LEATHERMAN,
Clerk Circuit Court
By [signature] D.C.

IN THE CIRCUIT COURT OF THE 11TH JUDICIAL CIRCUIT OF FLORIDA, IN AND FOR DADE COUNTY

IN CHANCERY NO. 180588-I

R. S. LEVY; DANIEL LIFTER and J. J. LANSBURGH, as Trustee for THE ELLEN LANSBURGH TRUST, THE MORRIS LANSBURGH, JR. TRUST and THE LEONARD LANSBURGH TRUST,

Plaintiffs,

-vs-

HOTEL EMPLOYEES UNION, LOCAL NO. 255, (A. F. of L.) et al.,

Defendants.

FILED FOR RECORD
JAN 9 2 31 PM 1956
E. B. LEATHERMAN
CLK. CT. CT. DADE CO. FLA.

FINAL DECREE

THIS CAUSE coming on to be heard upon final hearing pursuant to the Stipulation of the parties to this cause, and the Court being fully advised in the premises,

IT IS THEREUPON ORDERED, ADJUDGED AND DECREED that the restraining order heretofore rendered against the defendants, and each of them, which order is recorded in Chancery Order Book 1217, Page 58, in the records of the Clerk of the Circuit Court of Dade County, Florida, be and the same is hereby made permanent. The injunction bond filed herein is hereby cancelled and the principal and surety released of all liability thereunder. The costs of this cause hereby assessed in the sum of $52.50 are taxed against the defendants, for which let execution issue.

DONE AND ORDERED In Chambers, Miami, Florida, this 6th day of December, 1955.

Robert L. Floyd
CIRCUIT JUDGE

31 - 293

XIV

BOOK 1217 PAGE 538

FILED FOR RECORD

DEC 23 11 .. AM

CLK. CIR. CT. DADE CO. FLA.

E

IN THE CIRCUIT COURT OF THE 11TH JUDICIAL CIRCUIT, IN AND FOR DADE COUNTY, FLORIDA IN CHANCERY

NO. 180445

MARTINIQUE HOTEL, INC., A Florida Corporation,

Plaintiff,

-vs-

HOTEL EMPLOYEES UNION, LOCAL #255, (A. F. of L.) et al.,

Defendants.

FINAL DECREE

23 Dec 55
27 Dec 55
In Chancery 1217 538
Clerk Circuit Court
By G Boyer D.C.

THIS CAUSE coming on to be heard upon final hearing pursuant to the Stipulation of the parties to this cause, and the Court being fully advised in the premises,

IT IS THEREUPON ORDERED, ADJUDGED AND DECREED that the restraining order heretofore rendered against the defendants, and each of them, which order is recorded in Chancery Order Book 1189, Page 525, in the records of the Clerk of the Circuit Court of Dade County, Florida, be and the same is hereby made permanent. The injunction bond filed herein is hereby cancelled and the principal and surety released of all liability thereunder. The costs of this cause hereby assessed in the sum of $20.07 are taxed against the defendants, for which let execution issue.

DONE AND ORDERED in Chambers, Miami, Florida, this 23rd day of December, 1955.

Luther A. Campbell
CIRCUIT JUDGE

Filed this 9 day of Jan A.D. 1956
recorded this 10 day of Jan A.D. 1956
in Chancery Order Book 1219 on Page 389
E. B. EATHERMAN,
Clerk Circuit Court
By E. Boyd D.C.

IN THE CIRCUIT COURT OF THE 11TH JUDICIAL CIRCUIT, IN AND FOR DADE COUNTY, FLORIDA IN CHANCERY

NO. 180412-D

MORRIS LANSBURGH and DANIEL LIFTER,

Plaintiffs,

-vs-

HOTEL EMPLOYEES UNION, LOCAL NO. 255, of the American Federation of Labor, et al.,

Defendants.

FINAL DECREE

FILED FOR RECORD
JAN 9 2 51 PM 1956
E. B. EATHERMAN
CLK. CT. CIR. CT. DADE CO. FLA.

THIS CAUSE coming on to be heard upon final hearing pursuant to the Stipulation of the parties to this cause, and the Court being fully advised in the premises,

IT IS THEREUPON ORDERED, ADJUDGED AND DECREED that the restraining order heretofore rendered against the defendants, and each of them, which order is recorded in Chancery Order Book 1189, at Page 522, in the records of the Clerk of the Circuit Court of Dade County, Florida, be and the same is hereby made permanent. The injunction bond filed herein is hereby cancelled and the principal and surety released of all liability thereunder. The costs of this cause hereby assessed in the sum of $52.50 are taxed against the defendants, for which let execution issue.

DONE AND ORDERED in Chambers, Miami, Florida, this 6th day of December, 1955.

CIRCUIT JUDGE

Sup